Historic Tax Credits

Assistance through the process

Historic Tax Credit by the Numbers

2018 numbers borrowed from Novogradac, a firm that does HTC and other TC consulting and research

https://www.novoco.com/periodicals/articles/historic-tax-credits _2020



Basically credit pays for itself x 4

ECONOMIC IMPACT **HH** AMOUNT OF PRIVATE FUNDS \$144.6B AMOUNT OF PRIVATE FUN LEVERAGED BY THE HTC PROGRAM THROUGH EY 2017 H FEDERAL TAX REVENUE GENERATED BY HTC DEVELOPMENTS OVER HISTORY OF PROGRAM H H INFLATION-ADJUSTED COST OF FEDERAL TAX CREDITS GRANTED _ AMOUNT OF PRIVATE INVESTMENT LEVERAGED FOR EACH DOLLAR OF TAX CREDITS. -ECONOMIC ACTIVITY CATALYZED FOR EVERY \$1 IN HISTORIC PROPERTY INVESTMENT. 0.79% RECAPTURE RATE FOR FEDERAL HISTORIC TAX CREDITS FOR 2000-2010 106,846 2.54M **ESTIMATED JOBS CREATED BY ESTIMATED JOBS CREATED** 100 **HTC DEVELOPMENTS** BY HTC PROJECTS IN FY 2017. IN HISTORY OF PROGRAM. WIDESPREAD, BENEFICIAL

Used nationwide on a variety of projects



Perception HTC requires museum style restoration

"There can be concern regarding potential design limitations. **This** concern is more perception than reality. NPS, which is responsible for reviewing and approving HTC work, is primarily focused on the preservation/treatment of historic material and the aesthetic compatibility of renovation design and new construction. Typically, the more visible an element on a building, the greater the scrutiny by NPS."

Quotes taken from "Historic Tax Credits 2020" by real estate expert John M. Tess of Novogradac



Try to help us think like developers and investors!

Reality Lots of Design Opportunities

Vibrant New Uses

"For example, exterior and public space treatments are more important to the NPS than remote interior spaces. Ironically, although the installation of new systems (e.g., mechanical, plumbing, electricity, telecommunications, and fire and life safety) are often hefty budget items, within limited parameters (such as whether ducting is exposed or buried) NPS review tends to take a light hand in this realm."



HTC can preserve very important landmark buildings and give important new uses

The owners of the 1949 McKissack & McKissack designed Universal Life Insurance building in Memphis used HTC to rehabilitate the building in an area **prime for high-rise redevelopment.**



Perception HTC requires museum style restoration

The rehabilitation design honored the buildings history by maintaining the overall office plan, and restoring original details like doors, floors, and wrought iron stair handrails but allowed for open offices and green features.





View of the second floor lobby

View of the updated former clerical pool space

Perception HTC requires museum style restoration

All while following the *Standards*, the design incorporated energy efficient systems, recycled products, and waste reduction practices that qualify it for LEED certification.



Perception HTC requires museum style restoration

The building will serve as office space for owner Self Tucker Architects with the City of Memphis's new Entrepreneurs Network Center, as primary tenant. The rehabilitation has brought renewed life and energy to a building that was vacant and endangered for eighteen years.



Mill or Factory Buildings Still Make Great Projects

More from Mr. Tess...

Shift away from manufacturing has left an "ever-growing number of large industrial complexes that historically played a critical role in the local economy but are now outmoded and ready for new mixed uses." On a lesser scale, changing values have resulted in more and more vacant institutional buildings such as schools and churches.

Mill or Factory Buildings Still Make Great Projects

Recent Example

E.W. King building--now home to the Bristol Renaissance Center and is home to various offices including Deloitte, a professional services company.

The restoration itself was thought to have created at least 25 jobs.

Catalyst for new growth in Bristol

According to Tracy Mumpower, a Deloitte spokesperson, "Almost all of the people who work in our office are from the Bristol area...to be able to stay in Bristol in a professional-level job...is absolutely amazing."

Deloitte currently has fifty employees but has plans to expand within the King Building space.



Tax Credit Language can be different from NR language

"certified historic

structure"

A **certified historic structure** is defined as a building that is

- listed in the National Register of Historic
 Places, either
 - individually or
 - as a contributing building in a National Register historic district,
- Only a certified historic structures qualify for the credits. The "structure" must be a building—not a bridge, ship, or a railroad car, for example.

"rehabilitation"

"**Rehabilitation**" is defined in the regulations (36 CFR Part 67) as:

The process of returning a building or buildings to a state of utility, through repair or alteration, which makes possible an efficient use while preserving those portions and features of the building and its site and environment which are significant to its historic, architectural, and cultural values.

Rehabilitation not only encourages the repair of historic buildings, it **allows appropriate alterations to ensure thei efficient contemporary use**. Examples include the continued use of hotels, stores, and private residences, as well as the adaptation of vacant schools into apartments, warehouses into offices, and industrial buildings into commercial space.

"historic character"

Historic buildings are physical records of past inhabitants. People make changes to buildings over time to fit new uses and needs. The **historic character** results from the **combination of the character-defining features that have established the appearance of the building as it has evolved over time**.

Character-defining aspects of the building that need to be identified and evaluated may include form and detailing of exterior materials, exterior features such as roofs, porches, and windows; materials, such as plaster and wood; finished and unfinished interior spaces; and interior features, such as moldings and stairways, room configuration, and spatial relationships, as well as structural systems.

"Certified rehabilitation"

The National Park Service must approve, or "certify" all rehabilitation projects seeking the 20% tax credit. A certified rehabilitation is a rehabilitation of a certified historic structure that is approved by the NPS as being consistent with the historic character of the property and, where applicable, the district in which it is located.

"Substantial rehabilitation test"

The project must meet the "substantial rehabilitation test." In brief, this means that the cost of rehabilitation must exceed the pre-rehabilitation cost of the building. Generally, this test must be met within two years or within five years for a project completed in multiple phases.

The cost of a project must exceed the greater of \$5,000 or the building's adjusted basis. The following formula will help you determine if your project will be substantial:

- A B C + D = adjusted basis
- A = purchase price of the property (building and land)
- B = the cost of the land at the time of purchase
- C = depreciation taken for an income-producing property
- D = cost of any capital improvements made since purchase

If the owner has a question about this, they should consult a tax accountant!

https://www.nps.gov/tps/tax-incentives/before-apply/eligibility-requirements.ht

"QRE" Qualified rehabilitation expenses Not every expense associated with a rehabilitation project contributes toward the calculations for the 20% rehabilitation tax credit. In general, only those costs that are directly related to the repair or improvement of structural and architectural features of the historic building will qualify.

Costs associated with these items are generally eligible

- Walls
- Partitions
- Floors
- Ceilings
- Permanent coverings, such as paneling or tiles
- Windows and doors
- Components of central air conditioning or heating systems
- Plumbing and plumbing fixtures
- Electrical wiring and lighting fixtures
- Chimneys
- Stairs
- Escalators, elevators, sprinkler systems, fire escapes
- Other components related to the operation or maintenance of the l

Expenses that do not qualify for the rehabilitation tax credit

- Acquisition costs
- Appliances
- Cabinets
- Carpeting (if tacked in place and not glued)
- Decks (not part of original building)
- Demolition costs (removal of a building on property site)
- **Fen**cing
- Feasibility studies

https://www.nps.gov/tps/tax-incentives/before-apply/qualified-expenses.htm

Process Overview

Part 1

Before

Needs an overview of what makes the building significant, architectural description of the building or buildings if a complex

Documents historic character

Part 2

Describe the During

Basically a project description of the rehab

- Form breaks down by type of work
- Amendment forms can document project changes

Documents HC will be retained

After

Part 3

Nothing written. Signed form requesting certification of rehab completed as done in the Part 2 and any Amendments, if needed

Lots of clear photos of the building post-rehab

Documents HC still there!

Part 2

Part 3

Be sure you are using the New NPS Forms!

A MITTONAL

NPS Form 10-168 (Rev. 06/2016 v2) OMB Com National Park Service	trel Ne. 102+0009		
HISTORIC PRESERVATION CERTIFICATION APPLICATION PART 1 – EVALUATION OF SIGNIFICANCE	Nos Form 10-1866, Vision		OMB Coasel No. 1024000
Institutions: This page must bus the applicant's original algobule and must be dated. The National Park Service conflictation decision is based on the decorption in this application them, in the event of any discompty belaves the application from and other suppresentations, makerial auxiliarities with it guard, as architectural plans, clavariga and spectrations), the application that must be presented as a conflict on the provided to the internal Revenue Service.	Instructions: This pa	age must bear the applicant's original signature and must be dated. The National Park Service certification options in this application form. In the event of any discrepancy between the application form and other, risk submitties with It (such as antitriciars) plans, <i>stratergs</i> and specifications), the application form takes	1 decision NP8 Project Number
1. Property Name	precidence. A copy of	of this form will be provided to the internal Revenue Service.	
Street	1. Property Name	e .	
City County State Zp	Street		
Name of Historic District		County State	Zin
National Register district certified state or local district potential district		District	
2. Nature of Request (check only one box)		Idually in the National Register of Historic Places; date of listing	
certification that the building contributes to the significance of the above-named historic district or National Register property for rehabilitation put		a Registered Historic District, name of district	
certification that the building contributes to the significance of the above-named historic district for a charitable contribution for conservation purp		a registred means blank, name of data A	of and Paralities
certification that the building does not contribute to the significance of the above-named district.		atatori or organizance submitted : Date submitted Date s	a centrator
 preliminary determination for individual listing in the National Register. preliminary determination that a building located within a potential historic district contributes to the significance of the district. 	2. Project Data		
preiminary determination that a building outside the period or area of significance contributes to the significance or the district.	Date of building		
		ngs in project Ficor area before / after rehabilitation	
3. Project Contact (f different from applicant)		aled) Use(s) before / after rehabilitation	
Name Company		(esilmated) Number of housing units before / after rehabilitation	
street City	Stale Number of phase	es in project Number of low-moderate income housing units before	ore / after rehabilitation /
Zp Telephone Email Address	3. Project Contac	ct (if different from applicant)	
4. Applicant	Name	Company	
I hereby attest that the information I have provided is, to the best of my knowledge, correct. I further attest that [check one or both boxes, as applicable I am the owner of the above-described property within the meaning of "owner" set forth in 35 CPR § 67.2 (2011), and/or	a; Street	City	
If i am not the fee simple owner of the above described property, the fee simple owner is aware of the action i am taking relative to this applicable	Ion and has no 7ip	Telephone Email Address	
objection, as noted in a written statement from the owner, a copy of which (i) either is attached to this application form and incorporated herein, or previously submitted, and (ii) meets the requirements of 36 CPR § 67.3(a)(1) (2011).	or has been 4. Applicant		
For purposes of this attestation, the singular shall include the plural wherever appropriate. I understand that knowing and wilkling fabrication of factual this application may subject me to fines and imprisonment under 15 U.S.C. § 1001, which, under certain circumstances, provides for imprisonment of	representations in I hereby attest the	at the information I have provided is, to the best of my knowledge, correct. I further atlest that [check one o	or both boxes, as applicable):
		iner of the above-described property within the meaning of "owner" set forth in 35 CFR § 67.2 (2011), and the fee simple owner of the above described property, the fee simple owner is aware of the action I am Lax	lar
Name Signature (Sign in Ink) Date	ottecton, a	as noted in a written statement from the owner, a copy of which it either is attached to this application form	n and incorporated herein, or has been
Applicant Entity SSN or TIN	previously a	submitted, and (II) meets the requirements of 36 CFR § 67.3(a)(1) (2011).	and a transformation of tracket recommendations in
Street City	State this application m	this attestation, the singular shall include the plural wherever appropriate. I understand that knowing and w nay subject me to three and imprisonment under 18 U.S.C. § 1001, which, under certain circumstances, pri-	ovides for imprisonment of up to 8 years.
Zp Telephone Email Address	Name	Signature (Sign in Ink)	Date
NPS Official Use Only		SSN	
The National Park Service has reviewed the Historic Preservation Certification Application - Part 1 for the above-named property and has determined that t			
contributes to the significance of the above-named distitct or National Register property and is a "certified historic structure" for rehabilitation purposes	s. 20	Telephone Email Address	
contributes to the significance of the above-named district and is a "certified historic structure" for a charitable contribution for conservation purposes.		SSN, or TIN has changed since previously submitted application.	· · · · · · · · · · · · · · · · · · ·
does not contribute to the significance of the above-named district.			
Preliminary Determinations:	NPS Official Use O		
appears to meet the National Register Criteria for Evaluation and will likely be listed in the National Register of Historic Places if nominated by the Sta Preservation Officer according to the procedures set forth in 36 CPR Part 60.		vice has reviewed the Historic Preservation Certification Application – Part 2 for the above-named property	
does not appear to meet the National Register Criteria for Evaluation and will likely not be listed in the National Register.	the rehabilitation meets the Secret	described herein is consistent with the historic character of the property and, where applicable, with the di tary of the interior's Standards for Rehabilitation. This letter is a preliminary determination only, since a for	istrict in which it is located and that the project mal certification of rehabilitation can be issued
appears to contribute to the significance of a potential historic district, which will likely be listed in the National Register of Historic Places II nominated Historic Preservation Officer.	i by the State only to the owner	r of a "oerfined historic structure" after rehabilitation work is complete.	
appears to contribute to the significance of a registered historic district if the period or area of significance as documented in the National Register nor documentation on the with the NPG is expanded by the State Historic Preservation Ottoer.		or proposed rehabilitation will meet the Secretary of the Interior's Standards for Rehabilitation if the attach described herein is not consistent with the historic character of the property or the district in which it is loc	
documentation on the with the NH's is expanded by the state Historic Preservation Officer. does not appear to qualify as a certified historic structure.	the rehabilitation Secretary of the I	described herein is not consistent with the historic character of the property or the district in which it is loc interior's Standards for Rehabilitation.	areo ano true the project does not meet the
Date National Park Service Authorized Stanature (Stan In Ink)	Date	National Park Service Authorized Signature (Sign in Ink)	
Late National Park Service Authorized Signature (sign in Ink)	NPS conditions o	2 12 1	
RECORDS RETENTION - PERMANENT. Transfer all permanent records to NARA 15 years after closure. (NPS Records Schedule, Resource Managemen			
Includius inclication inclusive and an examination records to NAPA 15 years after obstants. (NPS Records Schedule, Resource Management 1 & 21 (MATRADA.1))	R and Lands (IMII) RECORDS RETENTIO	ON - PERMANENT. Transfer all permanent records to NARA 15 years after closure. (NPS Records Sched	lule, Resource Management and Lands (flem

tzed Signature (Sign in Ink) owite in NARA 15 years after ringing. (NOS Revents Schedule, Resource Management and Lawle (form RECORDS RETENTIN 1.A.2) (N1-79-08-1)).

NP	S Form 10-168c (Rev. 01	6/2016 v2)			OMB Control No. 102
Nat	tional Park Service				-
14	and and a second		RESERVATION CERTIFICATION EST FOR CERTIFICATION OF C		13
F		PART 3 - REQU	ST FOR CERTIFICATION OF C	OMPLETED WORK	
1					
_	10000				
In	structions: This page mu	st bear the applicant's original sig	gnature and must be dated.		NPS Project Number
Ļ	-	1245 - Anno 14			
1.					
	Street				
	city		County		
	is property a certified hi	ilekoric structure? 🗌 Yes 🔲 N	io If yes, date of NPS certification	OR date of Nation	al Register listing
2.	Project Data				
	Project start date		Project completed and b	building placed in service date	·
			Total estimated costs (G		
			/ Number of low-moderale		
3		different from applicant)		E Ildaniy and	
э.			Company		
					State
	Street		Email Address		DOUT
4.	Applicant (Ust at at I hereby attest that the of "owner" set forth in 3 withul faistication of fac provides for implicomm IF I am not the fee relative to this age form and incorpo	aditional owners on next page.) Information I have provided is, to 56 CFR § 67.2 (2011). For purpose chail representations in this applie ent of up to 5 years. Additionally, e simple owner of the above desc plication and has no objection, an rades herein; or has been previou	the best of my knowledge, correct and that I am sets of this athetation, the singular shall include it cation may subject me to these and imprisonmen- thed property. I have checked this box to atheta is noted in a written statement from the owner, a sy submitted, and (b) meets the requirements of	the plural wherever appropria nt under 18 U.S.C. § 1001, wi I that the fee simple owner is	de. I understand that knowing high, under gertain dirgumsta aware of the action I am taki
4	Applicant (List all ad I hereby affect that the of 'owner' set forth in 3 with/i faisfication of fac provides for imprisonme If I am not the fee neizhve to this ap form and incorpor.	aditional centers on next page.) information i have provided is, to 56 CFR § 67.2 (2011). For purpoor cutal representations in this applic tent of up to 8 years. Additionally, a simple owner of the above desc piloation and has no objection, as rated herein, or has been previous r TIN has changed since previous	the best of my knowledge, correct and that I am sets of this athetation, the singular shall include it cation may subject me to these and imprisonmen- thed property. I have checked this box to attest is noted in a written statement from the owner, a sy submitted, and (b) meets the requirements of	the plural wherever appropria nt under 18 U.S.C. § 1001, wi I that the fee simple owner is	de. I understand that knowing high, under gertain dirgumsta aware of the action I am taki
4	Applicant (List all ad I hereby affect that the of "owner" set forth in 3 with/i faisfication of fac provides for imprisonme If I am not the fee neizhve to this ap form and incorpor.	difforuit owners on next page.) Information I have provided is, to 6 CPR § 67.2 (2011). For purpose that representations in this applies ner of up to 8 years. Additionally, e simple owner of the above decision plotation and have no objection, as added herein, or has been provious attach herein, or has been provious attach herein, or has been provious attach and owners within the meaning attach owners within the meaning	the basid of my knowledge, correct and that i are as of this attraction; the angular shall include to batton my culject no to these and imperonnees the operative. These develocit this too to attest noted in a written attainment from the cance; a sy submitted, and primets the requirements of why submitted approximation. The GCPT 9 67-2 (2011). gordware (stage in Inis)	the plural wherever appropria nt under 18 U.S.C. § 1001, wil 10 bit be tee simple owner is 1 copy of which statement (a), of als CFR § 67.3(a)(1) (2011)	Is: Lunderistand that knowing hish, under certain circumsta aware of the action I am taxi either is attached to this applic base Date
4	Applicant (List all ad I hereby allocit that the of "owner" est that in a provides the implicant if i an of the fee from and the fee form and theopo (applicant, SSN, of There are no add Name	difforuit owners on next page.) Information I have provided is, to 6 CPR § 67.2 (2011). For purpose that representations in this applies ner of up to 8 years. Additionally, e simple owner of the above decision plotation and have no objection, as added herein, or has been provious attach herein, or has been provious attach herein, or has been provious attach and owners within the meaning attach owners within the meaning	the basid of my knowledge, correct and that i are as of this attraction; the angular shall include to batton my culject no to these and imperonnees the operative. These develocit this too to attest noted in a written attainment from the cance; a sy submitted, and primets the requirements of why submitted approximation. The GCPT 9 67-2 (2011). gordware (stage in Inis)	the plural wherever appropria nt under 18 U.S.C. § 1001, wi I that the fee simple owner is a copy of which statement (a), of 36 CFR § 67.3(a)(1) (2011)	Is: Lunderistand that knowing hish, under certain circumsta aware of the action I am taxi either is attached to this applic base Date
4	Applicant (List all ad I hereby allocit that the of "owner" est that in a provides the implicant if i an of the fee from and the fee form and theopo (applicant, SSN, of There are no add Name	additonal owners on next page.) Internation I nave provided is, to 60 CPR 62-22 (2011) For purpose total representations in this apply to the provided of the apply and the strate of the above decision plotation and hate no objection, at ande herein, or the above decision or TIN has changed since previou attach durent in the meaning attach and owners within the meaning	the basid of my knowledge, correct and that i are as of this attraction; the angular shall include to batton my culject no to these and imperonnees the operative. These develocit this too to attest noted in a written attainment from the cance; a sy submitted, and primets the requirements of why submitted approximation. The GCPT 9 67-2 (2011). gordware (stage in Inis)	the plural wherever appropria nt under 18 U.S.C. § 1001, wil 1 that the fee simple owner is copy of which statement (a), at 36 CFR § 67.3(a)(1) (2011) SSN	Is: Lunderistand that knowing hish, under certain circumsta aware of the action I am taxi either is attached to this applic base Date
4	Applicant (List all ad I hereity alled that the of "owner" set that in 3 with distillation of the provides for implicant model to this ap form and incorpo Applicant, SSN, c There are no add Name	additional owners on nest page) information I have provided is, to GPU § 672 (2011). For pages chair representations in this applic chair representations in this applic is any ensure of the scheme elec- pication and has no objections and planter and has no objections and planter and has no objections and planter and has no objections or planter and has no objections of planter and has no objections of the has no planter and has no objections of the has no objections of the has no planter and has no objections of the has no objections of the has no planter and has no objections of the has no object	The best of my investigate, comed and that are ease of the advectory, the angular and that can be advectory and the sectory of the sectory of the theory of the sectory of	the plural wherever appropria nt under 18 U.S.C. § 1001, wil 1 that the the simple owner is copy of which statement (a) at 36 CPR § 67.3(a)(1)(2011) SSN	ale. Lunderstand that known hich, under certain circumsta aware of the action I am Sati time is attached to this appl
4	Applicant (List all ac I hereity allest that the of "owner" set toth in 3 with thetecological set toth in 3 with thetecological toth is proved it am to the fee ror and incorpo () Applicant, SSN, c Applicant, SS	additional owners on nest page) information I have provided is, to GPU § 672 (2011). For pages chair representations in this applic chair representations in this applic is single enance of the above elec- pication and has no objections and plotation and has no objections and plota	The best of my knowledge, correct and that I are see of its attinuation, the angust with incluses and may subject to 8 these and implementer maked property. I have cheests this best to altest raised in a within attinuation if the the source _2 by submitted against the numerical systems of the second second second second g of "owner" set both in 36 CPT § 67.2 (2011). 	the plural wherever appropria nt under 18 U.S.C. § 1001, wil 1 that the the simple owner is copy of which statement (a) at 36 CPR § 67.3(a)(1)(2011) SSN	ale. Lunderistand that known hich, under certain circumsta aware of the action I am Sati time is attached to this appl
	Applicant (Ust all ac Interly adds: that the "Interly adds: that the "Interly adds: that the statute is being any provides for implicant provides for implicant mail (copp) Applicant (SN) (Thete are no add Name Applicant (SN) (Street 2p Storet 2pS	atilitorial owners on ned page) intomation I have provided is, to control of the provided is to control operationations in the appli- tent of spin 0 years. Additionally, control operationations in the appli- dent of spin 0 years. Additionally, and herein, or has about elses plastion and has no objection, and and herein, or has about elses and herein, or has been previou attional owners within the meaning Telephone	he best of ny knowledge, cornet and hal i an ear of his alknowledge. Knowledge and have a his may subject not his all or typerconnect his project, i have checked his too is alked on the subject of the subject of the subject y submitse, and by submitse his negative of owner's set him his 3C GPU § C2 C011 granter (clip) hi his 3C GPU § C2 C011 grant Address	the plural wherever appropriat the network 30 LCS, 5 1001, with a low the fee simple owner is a copy of which statement (b) a low CFR § 67 2(a)(1) (2011) SON	lei. Lunderstand that knowing Nich, under oerlah oftourneta aware of the action I am take ether is attached to this appl Date Or TN State
	Applicant (List are drowner set to the drowner set to the provide set to the match desidence of provide set of match set o	assnara centra of and page) of Corte 5 of 2 (2011), for pages of Corte 5 of 2 (2011), for pages of Corte 5 of 2 (2011), for pages assigns and the original of the second second original of the second second second second second assigns and the original of the second second the second second second second second second the second second second second second second Telephone	The best of my investigate, comed and that are ease of the advectory, the angular and that can be advectory and the sectory of the sectory of the theory of the sectory of	the plusit wherever appropriate the one of 50 LGS (5 100), with that the the simple owner is copy of which statement (a), at 36 CFR § 67 3(a)(1) (2011) 	Idealization that incompare aware of the action 1 am take both Date
	Applicant () of a set of "seaf" at 2011 13 of "seaf" at 2011 13 of seaf" at 2011 13 of seaf" at 2011 13 of seaf 13 of sea	attention developer to an end page 1 attention of the antibiotic sector of the attention of the data of an end of the attention of the attention of the data of the attention of the attention of the attention of the data of the attention of the attention of the attention of the data of the attention of the attention of the attention of the data of the attention of the attention of the attention of the attention of the data of the attention of the attenti	No bed of the Manual Spe. Strend Sp. Strend	The purchase hardware appropriate to the strategies and the strategies	Idealized for the locary of the locar o
The	Applicant () of a set of "seaf" at 2011 13 of "seaf" at 2011 13 of seaf" at 2011 13 of seaf" at 2011 13 of seaf 13 of sea	Stature conversion on end page), the end of the stature of the stature of the conversion of the stature of the stature of the	No beek of the transmittige, ensure and had a set taken the particular the following the taken the particular term particular the particular the taken the following the particular the particular the taken the following the particular the particular the taken the following the particular the particular the taken the following set of the particular the particular the taken the following set of the particular the particular the taken the following set of the particular the particular the taken the following set of the particular the particular the taken the following set of the particular the particular the taken the following set of the particular the particular the following the effective the particular the following the particular the following the particular the particular the following the particular the following the particular the particular the following the particular the following the particular the particular the following the particular the following the particular the particular the following the particular the following the particular the particular the following the particular the following the particular the particular the following the particular the following the particular the particular the following the particular the following the following particular, the following the followin	The purchase hardware appropriate to the strategies and the strategies	Idealized for the locary of the locar o

1.A.2) (N1-79-00-1)).

NPS Comments Atlacts

Part 2

NPS Form 10-168a (Rev. 05/2016 v2)

Part 3

Submit two "wet-signed" copies of forms to me

OMB Control No. 1024-0009

NP	Form 10-168 (Rev. 05/2016 v2) onal Park Service		OMB Control No. 1024-0009
and a		HISTORIC PRESERVATION CERTIFICATION APPLICATIO PART 1 – EVALUATION OF SIGNIFICANCE	» 🙀
15	based on the descriptions in this ap polementary material submitted with	applicant's original algoature and must be dated. The National Park Service certification station form. In the event of any discopancy between the application form and other, it (such as architectural plans, drawings and specifications), the application form takes provided to be informal Revenue Service.	decision NPS Project Number
	Property Name		
		County State _	Zp
	Name of Historic District		
	National Register district	certified state or local district	
2	certification that the building certification that the building preliminary determination for preliminary determination for	one boal) contributes to the significance of the above named historic district or National Register pro contributes to the significance of the above named historic district for a charitable contrib dise on contribute to the significance of the sove-named district. Instructual military in the National Register. I a substity boale state particular of significance contributes to the significance of the at a substity south set partical or area of significance contributes to the significance of the at a substity south set partical or area of significance contributes to the significance of the significance of the significance of the significanc	ation for conservation purposes.
	Project Contact (I'different inc	m applicant)	
	Name	Company	
	Street	City	State
	Zp Telep	hone Email Address	10 61 33
	I am the owner of the above If I am not the fee simple ow objection, as noted in a write previously submitted, and (II For purposes of this atlestation, the	I have provided is, to he best of my innoviedge, correct. I harter attest that [check one of described property within the meaning of "owner" set oftain 3.3 CFR § 57.2 (2011), and one of the action described property, the loss drive (and a set of the action described property. The loss drive (and a set of the action described property, the loss drive (and a set of the action described to the application to the mean tendence of a CFR § 57.2 (2011), and the action and the loss of the action described to the application to the action and and a set of the action (and action described to the action and action described to the action and action actio	or ng relative to this application and has no and incorporated herein, or has been ithut faisification of factual representations in
	Name	Signature (Sign in Ink)	Date
	Applicant Entity	55N	or TIN
	Street	city	State
	Zip Teleş	hote Email Address	
D	5 Official Use Only		
		the Historic Preservation Certification Application - Part 1 for the above-named property	and has determined that the property
'n		e above-named district or National Register property and is a "certified historic structure"	
i		e above-named district and is a "certified historic structure" for a charitable contribution f	or conservation purposes.
j	does not contribute to the significa	nce of the above-named distinct.	
rei	ininary Determinations:		
1	appears to meet the National Regi	ster Criteria for Evaluation and will likely be listed in the National Register of Historic Plac he procedures set forth in 36 CFR Part 60.	es if nominated by the State Historic
1	does not appear to meet the Natio	nal Register Criteria for Evaluation and will likely not be listed in the National Register.	
1	appears to contribute to the signific Historic Preservation Officer.	cance of a potential historic district, which will likely be listed in the National Register of H	istoric Places If nominated by the State
	appears to contribute to the significance of t	sence of a registered historic district if the period or area of significance as documented a 5 is espanded by the State Historic Preservation Officer.	the National Register nomination or district
1	does not appear to quality as a ce		
1			
at		National Park Service Authorized Stanature (Stan in Ink)	

8	based on the description	ns in this application form, in the	signature and must be dated. The National e event of any discrepancy between the appli	cation form and other.	ision NPS Project Numb
1 10	pplementary material su recedence. A copy of this	sometied with it (such as architec s form will be provided to the inte	dural plans, drawings and specifications), the email Revenue Service.	e application form takes	
1.	Property Name				
	steet				
	city		County	State	Zip
	Name of Historic Distr				
			Ronic Places; date of listing		
		gistered Historic District; name o			
	Part 1 - Evaluat	ion of Significance submitted?	Date submitted	Date of ce	nolikanit
2.	Project Data				
			Estimated rehabilitation co	sts (QRE)	
			Picor area before / after re		1
			Use(s) before / after rehab		1
			Number of housing units b		
	Number of phases in p		Number of low-moderate in		
3.		different from applicant)			
	Street		City		State
	Zip	Telephone	Email Address		
4.			to the best of my knowledge, correct. I furthe within the meaning of "gamer" set forth in 35		
4	I hereby allest that the I am the currer of If I am not the te objection, so the te previously subm For purposes of this al this application may se	of the above-described property e simple owner of the above dee led in a written statement from ti died, and (1) meets the requiren diestation, the singular shall incl, ubject me to three and imprison	within the meaning of "owner" set forth in 36 corbid property, the fee dimple owner is ave the owner, a copy of which (i) other is attache nests of 36 CFW § 67.3(a)(1) (2011). ude the plazal wherever appropriate. Funders nent under 16 U.S.C. § 1001, which, under o	CPR § 67.2 (2011), and/or are of the action I am taking n ed to this application form and stand that knowing and willful sertain circumstances, provide	relative to this application and d incorporated herein, or has fatsification of factual represe es for imprisonment of up to b
4	I hereby abest that the I am the center of off arm not the fe objection, as not previously subm For purposes of this a this application may se Name	of the above-described property is simple owner of the above de- led in a writem tradement from the deed, and (it) meets the requirem disetation, the singular shall inclu- testation, the singular shall inclu- te the the three and imprisons	within the meaning of "center" set forth 113 as corbox property, the fee dimple center is as the center, a cograd of which (i) effect is all activ here is a constrained of the set of the set ment of the planat wherever appropriate. Linden nent under 15 U.S.C. § 1001, which, under o Signature (Sign In Ink)	CPR § 67.2 (2011), and/or are of the action I am taking r ed to this application form and stand that knowing and with it sertain circumstances, provide	relative to this application and d incorporated herein, or has felsitication of factual represe as for imprisonment of up to the Date
4	I hereby abest that the I am the center of I am not the fe objection, as not previously subm For purposes of this a this application may se Name Applicant Entity	of the above-described property is simple owner of the above described led in a writer statement from the data and (II) meets the requirer destation, the singular shall include ubject me to thes and imprisons	within the maxing of "carver" set forth in 36 control property. In the during conter is ava- te carver, a copy of within () either is attacht ness of 36 CPP (§ 77,34(1) (2011)). Job the plural wherever appropriate. Linder neet under 16 U.S.C. § 1001, which, under o Gignature (Sign In Ink)	CPR § 67.2 (2011), and/or are of the action 1 am taking n ed to this application form and stand that knowing and willful serialin droumstances, provide	relative to this application and incorporated herein, or has raistification of factual repress so for imprisonment of up to to Date or TIN
4	I nerecy altest that the I am the counter o I am the counter o I am the counter o I and the counter o I am the counter o I am the counter o I am the counter of the a I this application may se Name Applicant Entity Street	of the above-described property e simple owner of the above det etcl in a withen addetment from it titled, and (1) melds the requirent titled, and (1) melds the requirent titled, and (1) melds the requirent titled, and (1) melds and imprison between the title of the source of the s	within the meaning of "owner" set forth in 52 crobed property, the de simple course is ave the owner, a copy of which (i) letther is states the owner, a copy of which (i) letther is states mesh of a CHY & STA(34) (12011), ade the planar wherever appropriate. Lunders mesh under 16 LLS.C. § 1501, which, under o Signature (Sign In Ink)	CPR § 67.2 (2011), and/or are of the addion 1 am taking r do to this application form and stand that knowing and will & settain droumstances, provide 	relative to this application and incorporated herein, or has raistification of factual repress so for imprisonment of up to to Date or TIN
4	I hereby abest that the I hereby abest that the I am the owner of If I am not the fe objector, as not the fe objector, as not previously subm For purposes of this at this application may se Name Applicant Entity Street Zp	of the above-described property is simple owner of the above described led in a writer statement from the data and (II) meets the requirer destation, the singular shall include ubject me to thes and imprisons	within the meaning of "basers" set forth in 35 context property, the de simple ourse is ave the owner, a copy of which (i) letter is stated means of 36 CFR § 27,3(3)(1) (2011), uide the guara whenever, appropriate, Lunder ent under 10 LLS, 25 1507, which under o Signature (Sign In Init) CRIV 	CPR § 67.2 (2011), and/or are of the addion 1 am taking r do to this application form and stand that knowing and will & settain droumstances, provide 	relative to this application and incorporated herein, or has raistification of factual repress so for imprisonment of up to to Date or TIN

Р		SERVATION CERTIFICATION T FOR CERTIFICATION OF C		к 🍯
netructions: This page must bear th	e applicant's original signa	ture and must be dated.		NPS Project Number
Property Name				
Street				
city		County	State	Z1p
is property a certified historic stru		If yes, date of NPS certification		
Project Data				
Project start date		Project completed and b	utiding placed in service d	tate
Estimated rehabilitation costs (Q	RE)	Total estimated costs (C	RE plus non-QRE)	
Number of housing units before t	after rehabilitation	/ Number of low-moderal	e housing units before/afte	er rehabilitation /
Project Contact (it different it	form applicant)			
Name		Company		
Street		Cty		State
Zip Tel	ephone	Email Address		
form and incorporated here Applicant, SSN, or TIN has	to 8 years. Additionally: writer of the above describe and has no objection, as no ain, or has been previously is changed since previously	ed property, I have checked this box to attest ded in a written statement from the owner, a submitted, and (b) meets the requirements o submitted application.	that the fee simple owner	is aware of the action I am taking
provides for imprisonment of up i if i am not the fee simple o notative to this application a form and incorporated here Applicant, SSN, or TIN has There are no additional ow	to 8 years. Additionally: writer of the above describs and has no objection, as no ain, or has been previously is changed since previously mers within the meaning of	ed property. I have checked this box to affest led in a written statement from the owner, a submitted application. "owner" set forth in 36 CFR § 67.2 (2011). Signature (Sign in Int).	that the fee simple owner copy of which statement (r 36 CFR § 67.3(a)(1) (201	is aware of the action I am taking a) either is attached to this application 11). Date
provides for imprisonment of up i if i am not the fee simple o notative to this application a form and incorporated here Applicant, SSN, or TIN has There are no additional ow	to 8 years. Additionally: wher of the above describs and has no objection, as no ain, or has been previously dhanged since previously mens within the meaning of	ed property. I have checked this box to attest test in a written statement from the owner, a submitted, and (b) meets the requirements o submitted application. "owner" set torth in 36 CFR § 67.2 (2011). Signature (Sign in Ink)	that the fee simple owner copy of union statement (f 36 CFR § 67.3(a)(1) (201 	is aware of the action I am taking a) either is attached to this application 11. Date Date
Provides for imprisonment of up i if i am not the fee simple or notative to this application a form and incorporated here Applicant, SSN, or TIN has There are no additional ow Name	to 8 years. Additionally: wher of the above describs and has no objection, as no ain, or has been previously dhanged since previously mens within the meaning of	ed property. I have checked this box to allesi bad in a witten datament from the camer, a submitted, and (b) meets the requirements o submitted application. "owner" set torth in 36 CFR § 67.2 (2011). Signature (Sign in Ink)	that the fee simple owner copy of union statement (f 36 CFR § 67.3(a)(1) (201 	is aware of the action I am taking a) either is attached to this application 11. Date Date
provides for implecement of up i If i am not be easingle or isom and incorporates here Applicant. SIN. or TIN has These are no additional ow Name Applicant Entity Street	to 8 years. Additionally: wher of the above describ- and has no objection, as no ain, or has been previously is changed since previously mens within the meaning of	ed property. I nave checked this box to attlest ded in a written diatement from the caner. 2 submitted, and (b) most's the requirements o submitted application. "owner's set both in 36 CPR § 672 (2011). "Signature (Sign in Init)	that the fee simple owner copy of which statement (f 36 CFR § 67.3(a)(1) (201 	is aware of the action I am taking a) either is attached to this application 11. Date Date
provides for implecement of up i if i am not be tearing to instante to this application a form and incorporated herein Applicant SSN, or TIN has interest are to additional or Name Applicant Entity Street Zp Tell 25 Official Use Only	to by pors. Additionally: where of the above describt and has no objection, as no since has been previously in thanged since previously mers within the meaning of aphone	ed properly. I have checked this box to altest bid on a within statement from the enner, a submitted and () method the negatimential submitted approaches. Signature (3ign In Ini) City Email Address	that the tee simple owner copy of which statement ('Sis GPR § 67.3(a)(1) (201 	is aware of the action I am taking a) other is affached to this application 11. Date 0 or TN State
provide for implemented of up if an other bareage on term and incorplated here Application (SAL, or Thin has There are no additional or Application (SAL, or Thin has There are no additional or Application (SAL, or Thin has Deset	to 3 years. Additionally, the display of the objection, and a wind the above display of the objection, and wind the objection, and wind the objection of the objection of the objection of the objective display of the objec	or graves, the has device the loss is and an advected and the loss of a set of advector the server. A server a set of the loss of the server and the loss of the l	That the See sample owner copy of ends tables of (55 Cert & Scalar) (Col) 	Is accure the action is an using a given is allowed to this application in 11.
provide in programmed of all subscriptions of all all subscription of all all all compared to the subscription of the subscrip	In a years, Additionally, and Additionally, and Additionally, and Additionally, and Additionally, and Additional and Additional and Additional and Additional and Additional and Additional Addita Additional Addita Additional Addita	uj grangs, hana devident hite osti tadit di la national administri hite historia care a submitta agrobani "Same" eli tahin ki Criff § 67 (2011) "Same" eli tahin ki Criff § 67 (2011) "Garari eli tahin ki Criff § 67 (2011) "Garari Acanesa "Crini Acanesa Italia Acanesa Italia Acanesa Presidenti de la companya de la companya tatiana Acanesa Presidenti de la companya de la companya mana Acanesa Presidenti de la companya de la companya Italiana Acanesa Presidenti de la companya de la companya Italiana fertanta Tenena Senka Companya de la companya Italiana fertanta Tenena Senka Companya de la companya Italiana fertanta Tenena Senka Companya de la com	that the beat single over- logger of which addresser (2 St CIPR § 67-3(2)(7) (201 	
provide in programmed of og i menne se have application and the second	In a year, Additionally, and a set of the se	or popport, in the density the tot balance is a sime distance in the secret as a sime distance in the secret, a superior agreement of the secret as a sime distance and the secr	that the beat single over- logger of which addresser (2 St CIPR § 67-3(2)(7) (201 	

RECORDS RETENTION - PERMANENT. Transfer al permanent records to NAPA 15 years after docure. (NPS Records Schedule, Resource Management and Lands (Item 1.4.2) (N1-79-88-1)).







Evaluation of Significance Take good photos! Do not need a photo of every single inch of the building for the Part 1.

Do need overviews of main spaces, character defining features, and representative views of offices/apartments if similar.





For Parts 1-3

Just because you took the photo doesn't mean you have to use it. Don't include it if it is:

- blurry,
- repeats the same area,
- or isn't a character defining feature

Paring down photos means less you have to label and key.







Photos cannot be submitted digitally...to NPS.

NPS Requirement! I will have to send it back if you do not include printed photos.

Photos must be submitted on photo paper.

- Regular (Crisp and Clear) 4X6 type prints are fine.
- Regular copy paper is not allowed.
- Must be labeled on the back of the photo







Make sure you have a clear **photo key**, **site plan**, and **floor plans**

NPS Requirement! It doesn't have to be architectural renderings, but I will have to send it back if you do not include these things.







If property is **Contributing** within a HD, provide

- The info from the NR
- An updated architectural description, both interior and exterior
- Explain any changes from when it was listed.





WEST SIDE PUBLIC SQUARE LOOKING NORTH, DYERSBURG, TENN.

www.MyGenealogyHound.com 111165





If property is **Non-Contributing within a HD** but sufficient changes have occurred that it would now be contributing, provide

- the info from the NR
- an updated architectural description, both interior and exterior
- Explain any changes from when it was listed and why it should now be contributing
- Note the POS and how it would fit with it













Submit two copies of everything to SHPO for review. SHPO will submit to NPS.

If they have any comments they will let us know but eventually, in most cases,

NPS certifies your building!



Description of Rehabilitation





Part 3

Describe the Rehab

P2 also requires Plans and Overall Site Plan



Form must include a clear and concise project description of the rehab

- Form breaks down by type of work
- Work must meet all of the Secretary of the Interior's Standards for Rehabilitation
- Be clear about where work will not be happening (if a single large building or complex)
- Document what will happen to the entire property (landscaping features, parking lots, etc)

19. Cafeteria

24. Courtyard



• Include renderings to document project will meet the standards







P2 Can Need More Photos Than P1 Make sure the labels are clear and descriptive

Photo #1

Sterick North, 22 N. BB King Blvd, Memphis, TN 38103 View: Exterior from NW Description: Exterior showing North and West façades 11/14/19

Photo #3 Sterick North, 22 N. BB King Blvd, Memphis, TN 38103 View: Exterior from NE Description: Exterior showing North façade 11/14/19

Photo #2

Sterick North, 22 N. BB King Blvd, Memphis, TN 38103 View: Exterior from SW Description: Exterior showing West façade 11/14/19

Photo #4 Sterick North, 22 N. BB King Blvd, Memphis, TN 38103 View: Exterior from NE Description: Exterior showing lower Levels of North and East façades 11/14/19





Needs Clear Plans

Make sure you have documented the building with photos, site plans, and floor plans every where work is proposed....and again photos are keyed to site plan/floor plans.









Submit two copies of everything to SHPO for review. SHPO will submit to NPS. NPS will contact the owner to pay the fee before they begin their review. More info about the fee is <u>here.</u>

If they have any comments they will let us know but eventually, in most cases, NPS approves your rehabilitation!

Begin the Rehabilitation







Things come up.

- Amendment form can document project changes
- Easy form
- Also needs plans, renderings, etc. to document proposed changes from Part 2

But when construction is complete, the building it has been "placed into service," and is listed in the National Register...you are ready for the Part 3!

Part 3 is the Request for Certification of Completed Work







P3 is relatively simple. The After.

Part 3 is the Request for Certification of Completed Work

Our office and NPS will evaluate the completed project and compares it with the work proposed in the Part 2 application form.

If it meets the Standards, the National Park Service approves the project as a certified rehabilitation eligible for the 20% rehabilitation tax credit.

Photo #1
Sterick North, 22 N. BB King Blvd, Memphis, TN 38103
View: Exterior from NW
Description: Exterior showing North and West façades
11/14/19

Photo #3 Sterick North, 22 N. BB King Blvd, Memphis, TN 38103 View. Exterior from NE Description: Exterior showing North façade 11/14/19 Photo #2 Sterick North, 22 N. BB King Blvd, Memphis, TN 38103 View: Exterior from SW Description: Exterior showing West façade 11/14/19

Photo #4 Sterick North, 22 N. BB King Blvd, Memphis, TN 38103 View: Exterior from NE Description: Exterior showing lower Levels of North and East façades 1/1/14/19





P3 is essentially photos.

Helpful to take same photos as P2.

- Can reuse the photo keys and labels!
- Easy to see rehab as before and after.

Photo #1 Sterick North, 22 N. BB King Blvd, Memphis, TN 38103 View: Exterior from NW Description: Exterior showing North and West façades 11/14/19

Photo #3 Sterick North, 22 N. BB King Blvd, Memphis, TN 38103 View: Exterior from NE Description: Exterior showing North façade 11/14/19 Photo #2 Sterick North, 22 N. BB King Blvd, Memphis, TN 38103 View: Exterior from SW Description: Exterior showing West façade 11/14/19

Photo #4 Sterick North, 22 N. BB King Blvd, Memphis, TN 38103 View: Exterior from NE Description: Exterior showing lower Levels of North and East façades 11/14/19



Photo 21 Universal Life Insurance Company 7/31/15 View from the rear entrance door looking along the central axial corridor to the front door.



Photo 21 Universal Life Insurance Company 1/31/19 View from the rear entrance door looking along the central axial corridor to the front door.





Photo 24 Universal Life Insurance Company 7/31/15 View of the second floor public lobby, looking towards the stair to the first floor.



Photo 24 Universal Life Insurance Company 1/31/19 View of the second foor public lobby, looking towards the stair to the frst foor.







Submit two copies to SHPO for review and SHPO submission to NPS.

If they have any comments they will let us know but eventually, in most cases,

NPS certifies your rehabilitation!





Once the Part 3 is Certified...

The owner can claim the credit...The End*

*Unless, the owner does anything rehab or ownership related in the next five years, plans will need to be submitted to our office to send to NPS for review on an Amendment form.







More Information

THC-<u>Federal Historic</u> <u>Tax Credit Program</u>

NPS-<u>Tax</u> Incentives—Technical Preservation Services

Novogradac <u>About the</u> <u>Historic Tax Credit</u> Holly Barnett holly.m.barnett@tn.gov 615.770.1098

Historic Tax Credit Program State Historic Preservation Office Clover Bottom Mansion 2941 Lebanon Pike Nashville, TN 37214